

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain materials marked confidential in other Uber sexual assault cases should be sealed. Plaintiffs file this Motion and the corresponding materials in response to the discussion with the Court during the February 22, 2024 Discovery Hearing and the Court's subsequent instruction to file these materials along with a motion to seal. *See* Minute Order, Dkt. No. 283 (Feb. 23, 2024). The materials are attached as Exhibits A and B to the Declaration of Sarah R. London, filed concurrently to this Administrative Motion.

Material To Be Filed Under Seal

The materials to be filed under seal are two settlement agreements. The parties in those matters, including Uber, designated them as confidential. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Exhibit A to the London Decl.	Confidential settlement agreement and release of all claims between Uber and Peiffer Wolf client ¹	Uber
Exhibit B to the London Decl.	Exemplar confidential settlement and release of all claims agreement with Uber	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Sarah R. London in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: February 26, 2024

Respectfully submitted,

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

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¹ The plaintiff's personal identifying information has been redacted.

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